

## **EXHIBIT 2**

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1 Did I read that correctly?

2 A. Yes.

3 Q. Did you discuss this email on any of  
4 the calls or videos we saw from your call  
5 history with [REDACTED]?

6 A. Yeah, that was when [REDACTED] called me  
7 to mention how she was uncomfortable and she  
8 felt like sending an email to Sara after her  
9 deposition, I believe.

10 Q. Did [REDACTED] ever tell you whether an  
11 email or one substantially similar to this was,  
12 in fact, sent?

13 A. I don't know if she sent it, no.

14 Q. The middle paragraph here makes  
15 reference to "the text [REDACTED] sent to me  
16 regarding the litigation."

17 Do you see that?

18 A. Yes.

19 Q. Do you have an understanding what  
20 text that refers to?

21 A. I think it was how [REDACTED] had asked  
22 [REDACTED] to be a part of the case or like what the  
23 involvement would be like after she had said  
24 yes, the expectations.

25 Q. At any point in time did [REDACTED] ever

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1 show you text messages that she exchanged with  
2 [REDACTED] concerning this case?

3 A. I don't know if she showed me or if  
4 she read them to me, but we certainly talked  
5 about it.

6 Q. And you talked about it in the month  
7 of July 2025?

8 A. Potentially earlier, because I knew  
9 my name had been put down, but I wasn't certain  
10 like now that I had moved to Texas what my  
11 involvement would be like.

12 Q. Is it your understanding from  
13 speaking with [REDACTED] that she has text messages  
14 on her own phone exchanged with [REDACTED]  
15 discussing this litigation?

16 A. I think that -- I think that the text  
17 message was maybe a screenshot between Sara and  
18 [REDACTED] about what to tell her friends about the  
19 deposition.

20 Q. And do you recall anything more  
21 specific about what was the substance of the  
22 message in that screenshot?

23 A. I don't know the substance, but the  
24 conversation was around the fact that there  
25 wasn't much substance at all, like we were

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1 really unclear how agreeing to speak with  
2 [REDACTED] lawyer got us involved in this in the  
3 first place.

4 Q. Did you -- did you actually see that  
5 screenshot or have it read to you by [REDACTED]?

6 A. I think it was read to me. I don't  
7 --

8 Q. Is it your understanding -- I'm sorry, go  
9 ahead.

10 A. I don't think I saw it, no.

11 Q. Was it your understanding that [REDACTED]  
12 had a copy of that screenshot on her own phone?

13 A. Yes, it's my understanding.

14 Q. Okay. In the second sentence of this  
15 middle paragraph, [REDACTED] email to you states  
16 that, "Specifically, yesterday I was asked not  
17 to provide/search for certain documents."

18 Is this something that [REDACTED]  
19 discussed with you?

20 A. So this email is not to me. This  
21 email is to Sara, and [REDACTED] sent it to me to  
22 proofread it.

23 Q. Right.

24 A. And my understanding was that [REDACTED]  
25 had shared her screen with Sara, and then I

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1 don't know exactly what she was told, but felt  
2 she was told just to not share her screen, and  
3 then I don't think it was discussed further, and  
4 that made [REDACTED] very uncomfortable.

5 Q. Do you have any understanding whether  
6 [REDACTED] conducted a search for documents and files  
7 similar to the search you testified that you  
8 undertook?

9 A. I believe she did. And after she had  
10 started sharing her screen and then was told to  
11 sort of stop sharing her screen, I don't know  
12 that that search was, like, evaluated.

13 Q. Okay. Apart from what's reflected on  
14 the page in front of you, did [REDACTED] speak any  
15 more specifically about anything from her  
16 deposition or related to her deposition that  
17 made her feel uncomfortable?

18 A. Just how little she was prepared, and  
19 I think that she was not served, she had just,  
20 you know, agreed to meet with Sara because Sara  
21 had offered to represent her, and so I think  
22 that [REDACTED] hadn't seen the deposition document  
23 request for information up until after that  
24 meeting is my understanding, and I think she  
25 felt like if Sara was representing her there

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1 should have been more discussion about, like,  
2 what that document fully entailed.

3 Q. Did [REDACTED] encourage you to get your  
4 own counsel for the deposition today?

5 A. She did not encourage me. I am  
6 Canadian, and when I had heard how uncomfortable  
7 she was and I just had, like, a feeling after  
8 the conversation with Sara that in order to,  
9 like, I don't think in any legal situation, I  
10 didn't want to necessarily be taking free help  
11 and I didn't trust a lawyer who worked for free.

12 Q. Is my understanding correct that you  
13 don't know one way or the other whether [REDACTED]  
14 conducted a search of her own electronic and  
15 paper files for documents responsive to her  
16 Deposition Notice?

17 MS. CRAIG: Objection,  
18 asked and answered.

19 A. I -- I don't know if she had searched  
20 prior to that meeting because she didn't have  
21 the document, but I think in the meeting, I  
22 think a 30-minute sort of pre-deposition meeting  
23 with Sara, I think in that meeting is maybe when  
24 she had started to search, and she pulled up her  
25 screen to show Sara and then was kind of told